

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

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UNITED STATES OF AMERICA,

INDICTMENT

Plaintiff,

18 U.S.C. § 1343

42 U.S.C. § 408(a)(3)

v.

42 U.S.C. § 408(a)(4)

ANNAMARIE GREEN,

Defendant.

THE UNITED STATES GRAND JURY CHARGES THAT:

INTRODUCTION

1. From in or about January 2015 through in or about January 2018, the defendant, ANNAMARIE GREEN ("GREEN"), concealed, misrepresented, and failed to disclose material facts in order to receive disability benefits from the Social Security Administration to which she was not entitled. Specifically, GREEN falsely claimed she was unable to work due to alleged disabling conditions, when in fact she continued to own, operate, and perform substantial work activities for her company, Select Homecare Services, Inc., which activities she denied, concealed, and failed to disclose.

COUNTS 1-5

(Wire Fraud)

2. Paragraph 1 is incorporated by reference as if fully set forth herein.

3. From in or about January 2015 through in or about January 2018, in the State and District of Minnesota, the defendant,

ANNAMARIE GREEN,

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knowingly and intentionally devised and executed a scheme and artifice to defraud and to obtain money from the Social Security Administration by means of false and fraudulent pretenses, representations, and promises, and concealment of material facts.

4. It was part of the scheme to defraud that GREEN falsely reported to the Social Security Administration that she was unable to work due to alleged disabilities. In reality, GREEN continued to perform substantial work activities for the company she owned and operated.

5. It was further part of the scheme that GREEN stopped drawing income from Select Homecare Services, Inc. and instead issued payments from Select Homecare Services, Inc. to her spouse in order for her work activities to be undetected.

6. It was further part of the scheme that as a result of her false statements, misrepresentations, and failures to disclose, GREEN fraudulently received more than \$40,000 in disability payments to which she was not entitled.

7. On or about the dates set forth below, in the State and District of Minnesota and elsewhere, the defendant,

ANNAMARIE GREEN,

for the purpose of executing and attempting to execute the above-described scheme and artifice to defraud, knowingly transmitted and caused to be transmitted by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, and sounds, as described below:

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Count	Date of Wire (on or about)	Wire Communication
1	May 11, 2016	Wire transfer of \$1,361.00 from the U.S. Treasury Department GREEN's account at Bank of Elk River.
2	June 8, 2016	Wire transfer of \$1,361.00 from the U.S. Treasury Department to GREEN's account at Bank of Elk River
3	July 13, 2016	Wire transfer of \$1,361.00 from the U.S. Treasury Department to GREEN's account at Bank of Elk River
4	March 8, 2017	Wire transfer of \$1,031.40 from the U.S. Treasury Department to GREEN's account at Woodlands National Bank
5	April 12, 2017	Wire transfer of \$1,031.40 from the U.S. Treasury Department to GREEN's account at Woodlands National Bank

All in violation of Title 18, United States Code, Section 1343.

COUNT 6

(Title II Disability Fraud)

8. Paragraph 1 is incorporated by reference as if fully set forth herein.

9. From in or about January 2015 through in or about January 2018, in the State and District of Minnesota and elsewhere, the defendant,

ANNAMARIE GREEN,

did willfully and knowingly make false statements and representations of material facts in an application for Social Security Administration disability benefits, and concealed and failed to disclose events affecting her right to such benefits with an intent fraudulently to secure disability benefits, all in violation of Title 42, United States Code, Sections 408(a)(3) and (4).

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FORFEITURE ALLEGATIONS

Counts 1 through 5 of this Indictment are incorporated herein by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

As a result of the offenses alleged in Counts 1 through 5, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to violations of Title 18, United States Code, Section 1343.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON